

1 Chad C. Butterfield, Esq.  
Nevada Bar No. 010532  
2 **WILSON, ELSER, MOSKOWITZ, EDELMAN & DICKER LLP**  
300 South Fourth Street, 11th Floor  
3 Las Vegas, Nevada 89101  
(702) 727-1400; FAX (702) 727-1401  
4 [chad.butterfield@wilsonelser.com](mailto:chad.butterfield@wilsonelser.com)  
*Attorneys for Defendant*  
5 **AMERICAN HONDA FINANCE CORPORATION**

6  
7 **UNITED STATES DISTRICT COURT**  
8 **DISTRICT OF NEVADA**

9  
10 **KAREN S. LAIRD,**

11 Plaintiff,

12 v.

13 **AMERICAN HONDA FINANCE CORP.;**  
**EQUIFAX INFORMATION SERVICES, LLC,**

14 Defendants.

Case No.: 2:17-CV-01383-JAD-NJK

**STIPULATION AND [PROPOSED] ORDER  
FOR EXTENSION OF TIME TO FILE  
RESPONSIVE PLEADING TO PLAINTIFF'S  
COMPLAINT**

**(First Request)**

15  
16 Defendant, AMERICAN HONDA FINANCE CORPORATION (hereinafter "AHFC"), by  
17 and through its counsel of record, CHAD C. BUTTERFIELD, ESQ., of the law firm WILSON,  
18 ELSER, MOSKOWITZ, EDELMAN & DICKER LLP, and Plaintiff, GREGORY P.  
19 ROMBOLETTI, by and through his counsel of record, DAVID H. KRIEGER, ESQ. of the law firm  
20 HAINES & KRIEGER, LLC hereby stipulate and agree to extend the deadline for filing a  
21 responsive pleading to June 21, 2017.

22 This stipulation is submitted in compliance with LR IA 6-1. Good cause exists for the  
23 requested extension, as counsel for AHFC has only recently been retained to represent AHFC in  
24 this matter and has only recently obtained the relevant file materials and information necessary to  
25 respond to the allegations set forth in the Complaint. Accordingly, the parties agree that the  
26 requested extension furthers the interests of this litigation and is not being requested in bad faith or  
27 to delay these proceedings unnecessarily.  
28

1 This is the parties' first request for extension of the deadline. The parties' failure to file this  
2 stipulation on or before June 7, 2017 (i.e., the original responsive pleading deadline) was the result  
3 of a clerical error by counsel for AHFC's former legal assistant, who inadvertently failed to calendar  
4 the deadline. Counsel for AHFC immediately contacted Plaintiff's counsel to request a stipulation  
5 to extend the deadline upon realizing that the responsive pleading deadline had passed. Plaintiff's  
6 counsel graciously agreed to the requested extension. Accordingly, the parties respectfully submit  
7 that the failure to submit this stipulation on or before June 7, 2017 was the result of excusable  
8 neglect.

9 DATED this 8th day of June, 2017.

10 **WILSON, ELSER, MOSKOWITZ,  
11 EDELMAN & DICKER LLP**

12 /s/ Chad C. Butterfield

13 Chad C. Butterfield, Esq.

14 Nevada Bar No. 010532

15 300 South Fourth Street, 11<sup>th</sup> Floor

16 Las Vegas, NV 89101

17 *Attorneys for Defendant Target Corporation*

18 DATED this 8th day of June, 2017.

19 **HAINES & KRIEGER, LLC**

20 /s/ David H. Krieger

21 David H. Krieger, Esq.

22 Nevada Bar No. 9806

23 8985 S. Eastern Ave., Suite 350

24 Henderson, NV 89123

25 *Attorney for Plaintiff Gregory Romboletti*

26 **ORDER**

27 **GOOD CAUSE SHOWN, IT IS SO ORDERED.**

28 Dated this 9th \_\_ day of \_\_ June \_\_\_\_, 2017.

  
UNITED STATES MAGISTRATE JUDGE